

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In Re:

Chapter 7 Case
Bky. No.: 04-33477-DDO

Paul Henry Voth,

Debtor.

**MEMORANDUM OF LAW IN RESPONSE TO TRUSTEE'S MOTION TO
EXTEND PERIOD TO OBJECT TO EXEMPTIONS**

Since the Trustee filed the motion to extend time to object to exemptions, the debtor has responded to requests for information. Specifically, an appraisal relating to the claimed exemption in real property has been provided to the Trustee. The debtor is not aware of additional information needed by the Trustee. The relevant language of Bankr.R.4003(b) is:

A party in interest may file an objection to the list of property claimed as exempt only within 30 days after the meeting of creditors held under §341(a) is concluded or within 30 days after any amendment to the list or supplemental schedules is filed, whichever is later. The court may, for cause, extend the time for filing objections if, before the time to object expires, a party in interest files a request for an extension

On behalf of the debtor, it is contended that the "cause" asserted by the Trustee under Bankr.R. 4003(b) is no longer present in this case to extend the objection period beyond September 15, 2004. Under the circumstances a one-week extension beyond the hearing date in this matter to September 15, 2004 is suggested as a reasonable time period in which the Trustee would determine whether or not to object to exemptions .

Respectfully submitted,

/s/ Brian L. Boysen

Brian L. Boysen, #0010522 of Counsel to
Kurt M. Anderson # 2148
Attorneys for Debtor
P.O. Box 2434
Minneapolis, Minnesota 55402-0434
(612) 333-3185

VERIFICATION

I hereby declare under penalty of perjury that I am the Debtor, that I have read the foregoing document and that the facts stated therein are true and correct.

Executed on: 9-1-04

Paul Henry Voth
Paul Henry Voth

Declaration of Service via Facsimile

Brian L. Boysen respectfully declares to the Court that on September 1, 2004, he served the following items:

MEMORANDUM OF LAW IN RESPONSE TO TRUSTEE'S MOTION TO EXTEND PERIOD TO
OBJECT TO EXEMPTIONS

This proof of service

Via facsimile on the following individuals or entities:

Roylene Champeaux	612-664-5788
Nauni Jo Manty, Trustee	612-340-7900
US Trustee	612-664-5516

VERIFICATION

I hereby declare under penalty of perjury that I have read the foregoing declaration; and that the facts stated therein are true and correct.

Executed on: September 1, 2004 /e/ Brian L. Boysen